

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HONERO FUND I, LLC,	:
	:
Plaintiff,	:
	:
- against -	: 15 Civ. 1553 (TPG)
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
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TRINITY INVESTMENTS LIMITED,	:
	:
Plaintiff,	:
	:
- against -	: 15 Civ. 1588 (TPG)
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
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**DECLARATION OF ELIZABETH M. HANLY IN OPPOSITION TO PLAINTIFFS  
HONERO FUND I, LLC’S AND TRINITY INVESTMENT LIMITED’S “ME TOO”  
MOTIONS FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, Elizabeth M. Hanly declares as follows:

1. I am an attorney admitted to practice before this Court and an associate at Cleary Gottlieb Steen & Hamilton LLP, counsel for defendant the Republic of Argentina (the “Republic”) in this matter. I submit this declaration on behalf of the Republic in opposition to plaintiffs Honero Fund I, LLC’s and Trinity Investment Limited’s motions for partial summary judgment.

2. Attached to this declaration as Exhibits A-U are true and correct copies of the following documents:

<u>Ex.</u>	<u>Document</u>
A	Pre-Judgment Plaintiffs Chart;
B	Post-Judgment Plaintiffs Chart;
C	G.A. Res. 68/304, U.N. Doc. A/RES/68/304 (Sept. 17, 2014);
D	Brief for the Republic of France as <i>Amicus Curiae</i> in Support of the Republic of Argentina’s Petition For a Writ of Certiorari, <i>Republic of Argentina v. NML Capital, et al.</i> , No. 13-990 (Mar. 24, 2014);
E	Brief for <i>Amicus Curiae</i> Professor Anne Krueger in Support of the Republic of Argentina and Reversal, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 12-105 (L) (2d Cir. Jan. 4, 2013);
F	Brief of the United States as <i>Amicus Curiae</i> in Support of the Republic of Argentina’s Petition for Panel Rehearing and Rehearing <i>En Banc</i> , <i>NML Capital, Ltd., v. Republic of Argentina</i> , No. 12-105 (L) (2d Cir. Dec. 28 2012);
G	Amended February 23, 2012 Order, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 08 Civ. 6978 (TPG) (S.D.N.Y. Nov. 21, 2012);
H	Brief of the United States as <i>Amicus Curiae</i> in Support of Reversal, <i>NML Capital, Ltd., v. Republic of Argentina</i> , No. 12-105 (L) (2d Cir. Apr. 4, 2012);
I	Brief for <i>Amicus Curiae</i> the Clearing House Association L.L.C. in Support of Reversal, <i>NML Capital, Ltd., et al. v. Republic of Argentina</i> , No. 12-105 (L) (2d Cir. Apr. 4, 2012);

- J Order, *NML Capital, Ltd. v. Republic of Argentina*, No. 08 Civ. 6978 (TPG) (S.D.N.Y. Feb. 23, 2012);
- K Memorandum of Law in Opposition to Plaintiff's Motions for Partial Summary Judgment and for Injunctive Relief Pursuant to the *Pari Passu* Clause, *NML Capital Ltd., v. Republic of Argentina*, No. 08 Civ. 6978 (TPG) (S.D.N.Y. Dec. 10, 2010);
- L Memorandum of Law in Support of the Motion by NML Capital, Ltd. For Partial Summary Judgment and for Injunctive Relief Pursuant to the Equal Treatment Provision, *NML Capital Ltd., v. Republic of Argentina*, No. 08 Civ. 6978 (TPG) (S.D.N.Y. Oct. 20, 2010);
- M Republic of Argentina, Registration Statement Amend. No. 1 (Jan. 28, 2010);
- N Ley [Law] No. 26,547, Dec. 9, 2009 (Arg.), *available at* <http://infoleg.mecon.gov.ar/infolegInternet/anexos/160000-164999/161317/norma.htm> (with English translation of excerpts);
- O Memorandum from Hon. Judge Thomas P. Griesa to Counsel (S.D.N.Y. Feb. 22 2007);
- P Ley [Law] No. 26,017, Feb. 10, 2005 (Arg.), *available at* <http://infoleg.mecon.gov.ar/infolegInternet/anexos/100000-104999/103619/norma.htm> (with English translation of excerpts);
- Q Letter from K. Reed to Judge Griesa, *NML Capital, Ltd. v. Republic of Argentina*, No. 03 Civ. 8845 (TPG) (S.D.N.Y. Jan. 14, 2004);
- R Declaration of Troland S. Link, *LNC Invs. LLC v. Republic of Nicaragua*, Folio 2000 1061, R.K. 240/03 (Comm. Ct. of Brussels Aug. 31, 2003);
- S Presidential Decree No. 256/2002, Feb. 6, 2002 (Arg.), *available at* <http://infoleg.mecon.gov.ar/infolegInternet/anexos/70000-74999/72144/norma.htm> (with English translation of excerpts);
- T *Elliott Assocs. L.P. v. Banco de la Nacion*, General Docket No. 2000/QR/92, Cours d'Apel [CA] [Court of Appeals], Brussels, 8<sup>th</sup> ch. Sept. 26, 2000 (Belg.);
- U Fiscal Agency Agreement (FAA), dated Oct. 19, 1994.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 27, 2015 in New York, New York.

/s/ Elizabeth M. Hanly  
ELIZABETH M. HANLY